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RCRA ESD — INSPECTION REPORT

by W. Douglas Smith

FILE COPY

RCRA Inspection Report
Van Waters and Rogers
Subsidiary of UNIVAR
9-24-91

FACILITY ADDRESS: Van Waters & Rogers Inc.
Subsidiary of UNIVAR
P.O. Box 10287
Portland, OR 97210

SITE ADDRESS: Van Waters & Rogers Inc.
Subsidiary of UNIVAR
3950 N.W. Yeon Avenue
Portland, OR 97210-1412

EPA ID No. ORD 009227398 Telephone No. (503) 222-1721

INSPECTION COMMENCED: 9-24-91 @ 1100 hours

SITE CONTACTS: Kirk Steinseifer, Area Operations Manager, (503) 222-1721
Mohamad Rizk, Regulatory Manager Western Region, (213) 265-8123
Clay Swartz, Chemical Lab Manager

INSPECTION TEAM: W. Douglas Smith, Sr. Compliance Investigator, (206) 553-7176
Kevin Schanilec, Compliance Specialist, (206) 553-1061

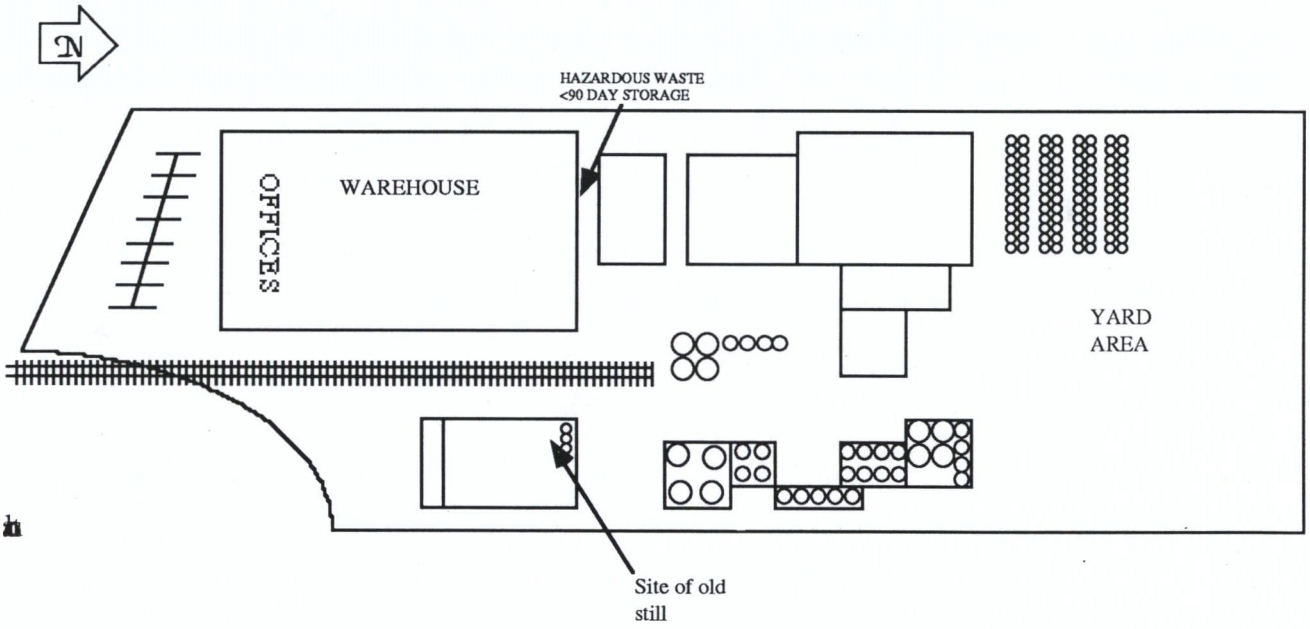
SITE BACKGROUND: Van Waters and Rogers has been at the same location since 1946. The primary activity of the facility has been the blending and distribution of chemicals for market. Materials are delivered to the site by truck and rail. The facility was under interim status as a Treater Storer and Disposer of

hazardous waste at the time of this inspection. The facility has been working with the Oregon Department of Environmental Quality (ODEQ) for final closure approval and reclassification as a Generator and removal from interim status. In June of 1988 the facility began a RCRA Facility Investigation (RFI) pursuant to a 3008 (h) Consent Order issued by EPA. Contamination discovered while performing the RFI indicates that final closure will not occur in the immediate future.

The last RCRA compliance inspection of this facility was on September 10, 1990. At that time the following concerns were raised:

1. Three instances of inappropriate use of the satellite accumulation rule.
2. LDR notices for hazardous waste shipments not present at the facility.
3. Training records were not available for one of the hazardous waste managers at the facility.

The facility has approximately the following layout:



OPENING CONFERENCE: The opening conference was with Kirk Steinseifer, Area Operations Manager. I introduced Keven Schanilec, EPA RCRA Compliance Specialist. Mr. Schanilec and I showed Mr. Steinseifer our credentials.
I explained the scope of the inspection and the approximate length of time it would take to complete our objectives. I asked Mr. Steinseifer how long the facility had been located at the same location. He said that VWR had operated the site since it opened in 1946.

of the clean up and disposal procedure was reviewed.

I reviewed the plant Contingency Plan. Mr. Steinseifer said that the SPCC was incorporated into that plan. Mr. Steinseifer was listed as the contact for all emergency response activities. The plan did not provide an adequate tank location, volume, and content description. I suggested that a map with that information should be generated and incorporated into the plan. (A copy of that plan was requested on 10-1-91).

I reviewed the plant Closure and Financial Assurance Plan. The plan was prepared by SRH Associates, Inc., 123 NE third Ave., Portland, OR. and submitted on December 31, 1986. The last previous modification of the plan was on July 13, 1981. The processes described in the plan are no longer in place or have been altered by the facility. Notification of these changes has not been made pursuant to §264.112 (c). Specifically some ofthe processes described involve the waste treatment stills which no longer operate. In addition uncharacterized wastes were discovered in metal acid bombs in the yard area which were not part of the area designated in the 1986 plan.

The facility Documentation Manual had all the information regarding Hazardous waste (HazWOPER) training. This also had information regarding inspection logs and waste handling information. I requested information regarding specific in dividuals which were known to handle hazardous materials. All the necessary training information including position, duties and time of training were present.

I reviewed all hazardous waste manifests for the years 1989, 1990, and up to the time of this inspection for 1991. I requested and was given copies of all the manifests reviewed. Land disposal restriction notifications were attached to all appropriate manifests. I observed that VWR served as tansporter for several loads of hazardous waste going to Chempro, 625 So. 32nd St., Washougal, WA. They identified themselves on the manifests as transporters with their Oregon EPA ID number in each case. Hazardouswastes sent to Texas receive a waste identification code number which corresponds to a Texas waste water code rather than the conventional EPA or Oregon Department of Ecology waste code. Examples of this are highlighted in yellow on the manifest copies attached.

Incomplete <90 day storage inspection logs:

Logs were inspected for the <90 day storage area (attached). The logs did not have the signiture of the person conducting the inspection, a place for noting any problems or the method of correcting any problems. The log noted inspections that were at least once a month and often once a day. They appeared to coincoincide with additions or removals from the area.

Mr. Schanilac assisted in reviewing all VWR documentation.

FIELD INSPECTION:

Mr. Steinseifer accompanied Mr. Schanilic and me on the field inspection. We visited every satellite accumulation area. Mr. Schanilic wanted to now if they considered the satellite accumulation areas as being under the immediate control of the operator/s of the process. The processes were not in progress at the time of our inspection but the containers with the waste were still being stored in the process areas. The wastes appeared to exceed the 55 gallons al lowed. In the satellite storage area near the old solvent stills there were three drums of hazardous waste. An estimate of the material in each of the drums indicated a total of approximately 77 gallons of waste though none of the drums had more than 30 gallons. The wastes consisted of a drum of rags, gloves, and overalls; a drum of contaminated sorbent materials; and a drum of liquid waste. All of these wastes were generated in the same process (See photographs 9 thru 17). Mr. Steinseifer was of the opinion that different wastes from the same process could be accumulated together in volumes of up to 55 gallons each.

Most of the drains and sumps were eroded. Mr. Steinseifer said that it was the slow eroding from acids and bases generated on the plant. He said that any variation from pH 7 causes concrete to erode. I asked what the range was for pH allowed in their discharge permit? He said that it was pH 5.5 to 11.5. He said that there were two 1100 gallon sumps used to treat their acid discharge. He said that these were scheduled for inspection and possible replacement soon. He said that a thorough evaluation of the integrity of the sumps would be conducted so that they could make sure that it didn't impact the work already underway under the 3008(h) consent order.

There were two instances where spills were discovered and reported to Mr. Steinseifer. In both cases Mr. Steinseifer stated that they would be cleaned up immediately, but after approximately 30 minutes neither spill had received any attention. The first case was a pallet of Calpro Germicidal Cleaner boxes. The bottom four boxes had been damaged and their contents had leaked onto the floor of the warehouse (See photographs 1 thru 5). The liquid had spilled over an area of approximately 10 square yards and was continuing to leak. Other material stacked on pallets immediately adjacent to the leaking containers were "floor finish", and several detergent cleaners. Mr. Stainseifer did not think that the spill would be potentially reactive with any of the other materials nearby.

The next instance of a spill was near the loading dock. A truck was backed up and there was a white powder below its tail gate (See photographs 6 & 7). Mr. Steinseifer said that he did not know what the material was.

The emergency alarm system consisted of air horns located in each satellite accumulation area, and a hard wired telephone with a sheet of instructions nearby (See photographs 8 & 9).

55 gallon drum of haz. waste improperly stored:

In the yard I found a 55 gallon drum with the label "Harshaw Electropure '24'," nickel sulfamate, 24 oz. to the gallon" (See photographs 30 & 3). It was reported by Mr. Steinseifer to be empty. I tipped the drum and found that it contained about 20 pounds or at least three gallons of liquid in the bottom. This was in conflict with what Mr. Steinseifer had stated was allowed in "empty" drums. He had said that empty meant that there was less than one inch of material left in the container when it was returned from the customer. I asked what he would do with the drum? He said that he would let the cooperage deal with it. Mr. Steinseifer had previously stated that drums with more than one inch of material would not be brought back to the facility by the delivery drivers. This drum appeared to be an exception to that policy. It was not labeled as containing hazardous waste, nor was it stored in either a designated satellite accumulation or <90 day accumulation area.

In the same general area as the drum of Electopure '24', there were 12 pallets of "nitric acid bombs" which had residual liquid in each of them. There was an average of about a pint of liquid in each metal bomb (See photographs 32 & 33). There were approximately 120 bombs in all (I made a single count). I made an estimation that the total volume of all the containers would be 7.5 gallons of unknown material. Mr. Steinseifer said that the liquid was probably rinsate water that had not been drained.

We inspected the entire facility. The laboratory was visited last.

Mr. Steinseifer introduced me to Clay Swartz, Chemist. There were no open hazardous waste containers in the laboratory. Wastes were stored in closed and labeled containers. Mr. Swartz said that it was company policy to take lab wastes and reintroduce them into the appropriate product lines rather than dispose of them. Mr. Swartz felt that the policy was a sound form of recycling.

CLOSING CONFERENCE:

The closing conference was held in the conference room. Mr. Steinseifer, Mr. Mohamed Rizk, Mr. Schanilec and I were present. We reviewed the observations made the previous day (9/24/91) and the morning of 9/25/91. I stated that the two major issues to be reviewed were the closure plan and financial assurance and the question of satellite accumulation where three waste streams from the same process were involved. Mr. Schanilec was not sure that greater than 55 gallons could be generated as satellite accumulation,

even if it was different wastestreams from the same process.

COMPLIANCE CONCERNS:

1. The existing closure plan was generated in 1988. The scope of closure costs and subsequent necessary financial assurance appeared to to be underestimated.

2. The total volume of satellite accumulation was in excess of 55 gallons, though it consisted of three separate types of wastes generated from the same operation.

SAFETY: Hard hats, steel toed boots, and safety glasses were required by plant management.

ATTACHMENTS:

A. Notebook
B. Photographs
C. VWR Contingency Plan
D. VWR Manifests
E. <90 day inspection log sheet
F. Closure Plan (1988)
G. Miscellaneous documents provided by VWR

Oct. 18, 1991
DATE

W. Douglas Smith, Sr. Compliance Investigator